

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION**

JANE DOE,

Plaintiff,

vs.

**LIMESTONE UNIVERSITY F/K/A
LIMESTONE COLLEGE, COLLINS
MURPHY, MG FREESITES, LTD., d/b/a
PORNHUB.COM, and HAMMY MEDIA
LTD. d/b/a XHAMSTER.COM,**

Defendants.

Case No.: 7:21-CV-03193-JD

MOTION TO AMEND

Plaintiffs, Jane Doe, by and through her undersigned counsel, respectfully moves this Court for leave to amend her Complaint pursuant to Rule 15 of the Federal Rules of Civil Procedure. Plaintiff requests leave to amend her Complaint in order to properly reflect the procedural posture of the associated case Jane Does 1-9 v. Murphy et. al. 7:20-cv-00947-JD.

A copy of the proposed Amended Complaint is attached hereto as Exhibit 1. In support of this Motion, Plaintiffs rely on the statements herein, the pleadings filed in this case, the rules of Court and such other matters as may be properly presented to the Court. This amendment will cause no undue delay or burden on Defendants and is being made prior to service.

Therefore, the Plaintiffs respectfully requests this Court enter an Order granting Plaintiffs' Motion to file a Second Amended Complaint.

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Respectfully submitted,

BELL LEGAL GROUP, LLC

s/J. Edward Bell, III

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October 18, 2021